

BUTLER | SNOW

June 11, 2014

Andrew N. Faes  
Wagstaff & Cartmell LLP  
4740 Grand Avenue, Suite 300  
Kansas City, Missouri 64112

Dear Andrew:

I am following up on your request for an updated and unredacted copy of Piet Hinoul's HR file. There are a handful of updates and we will provide those to you shortly in an upcoming production.

With the respect to your request for an unredacted copy of the HR file, your request appears to be focused on the redactions of Mr. Hinoul's compensation rather than on other personal information such as his social security number, etc. We presume that your request is limited to the compensation information, but if not, please let me know.

Although Mr. Hinoul has been designated as an unretained expert, the law is clear that his compensation information is not discoverable because he is not paid specifically for his expert testimony. *See SEC v. Nadel*, 2012 WL 1268297, \* (E.D.N.Y. 2012) ("This Court agrees that no purpose would be served by requiring Dr. Porter to disclose further salary and benefit information and concludes that Dr. Porter has fulfilled his obligations under Rule 26. Dr. Porter did not receive any separate compensation for his work on this particular case and by conveying this information to Defendants, he has stated 'the compensation for the study and testimony in the case.'"). Accordingly, upon further reflection, we cannot agree to produce this information.

I will be glad to discuss this with you if it would be helpful.

Sincerely,

BUTLER SNOW LLP



Benjamin M. Watson

BMW:fsw

EXHIBIT C

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